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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
IAN FURMINGER, et al.,  
Defendants.

Case No. CR-14-00102-CRB

**STIPULATION AND ORDER RE  
PRETRIAL FILING SCHEDULE**

## **STIPULATION**

**Whereas**, trial in the above-captioned case is set to commence on November 3, 2014.

**Whereas**, the parties have met and conferred regarding the pretrial filing schedule.

**IT IS HEREBY STIPULATED AND AGREED**, by and between the parties, through their respective counsel of record, and respectfully requested that the Court adopt the following pretrial filing schedule:

Date	Description
May 9 <sup>th</sup>	Defense Motions to Sever, Motions for Discovery
May 23 <sup>rd</sup>	Government Opposition
May 30 <sup>th</sup>	Defense Reply
June 11 <sup>th</sup>	Motions Hearing Date
June 27 <sup>th</sup>	Defense Suppression Motions
July 8 <sup>th</sup>	Government Opposition
July 18 <sup>th</sup>	Defense Reply
July 30 <sup>th</sup>	Motions Hearing Date
August 4 <sup>th</sup>	Deadline for <i>Jencks</i> material that exists at that time.
August 15 <sup>th</sup>	The Government must fully comply with all requirements of Local Rule 16-1(c). The Government must disclose a summary of (i) any evidence of other crimes, wrongs, or acts that it intends to offer under Federal Rule of Evidence 404(b), and which is supported by documentary evidence or witness statements, and (ii) any co-conspirators statements the Government intends to offer under Federal Rule of Evidence 801(d)(2)(E). These disclosures must be set forth in sufficient detail that the Court may rule on the admissibility of the statement.
August 22 <sup>nd</sup>	All parties to make expert disclosures.
August 29 <sup>th</sup>	The Government must provide to defense counsel all <i>Henthorn</i> material on law enforcement witnesses whom the government anticipates calling.
September 4 <sup>th</sup>	Deadline for <i>Giglio</i> material that exists at that time.
September 12 <sup>th</sup>	All Non- <i>Jencks</i> <i>Brady</i> information must be disclosed to defense counsel.
September 15 <sup>th</sup>	Stipulated Jury Questionnaire Filed
September 19 <sup>th</sup>	<i>Daubert</i> motions by both sides. If filed, oppositions due 21 days later, replies 7 days later. Court to set hearing date.
September 26 <sup>th</sup>	Deadline for Witness Lists – all parties.
October 3 <sup>rd</sup>	Deadline for Exhibit Lists – all parties.
October 9 <sup>th</sup>	Deadline to file Motions to Exclude and Motions in Limine.
October 16 <sup>th</sup>	Deadline to file Oppositions to Motions to Exclude and Motions in Limine.

1                   **IT IS SO STIPULATED.**

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3                   Dated: April 7, 2014

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5                   LAW OFFICES OF BRIAN H GETZ

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9                   By: /s/Brian H Getz  
10                   BRIAN H GETZ  
11                   Attorney for Defendant Ian Furminger

12                   Dated: April 7, 2014

13                   MELINDA HAAG  
14                   UNITED STATES ATTORNEY

15                   By: /s/John Hemann  
16                   JOHN HEMANN  
17                   RODNEY VILLAZOR  
18                   Assistant United States Attorneys

19                   Dated: April 7, 2014

20                   RAINS LUCIA STERN, PC

21                   By: /s/Harry S. Stern  
22                   HARRY S. STERN  
23                   Attorney for Defendant Reynaldo Vargas

24                   Dated: April 7, 2014

25                   BURKE LAW OFFICE

26                   By: /s/Eileen C. Burke  
27                   EILEEN C. BURKE  
28                   Attorney for Defendant Edmond Robles

19                   **ORDER**

20                   Based on the foregoing, and good cause appearing, **IT IS HEREBY ORDERED** that the  
21                   Court will adopt the above-referenced pretrial filing schedule in this action.

22                   **IT IS SO ORDERED.**

23                   Dated: April 11, 2014



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25                   THE HONORABLE CHARLES R. BREYER  
26                   United States Senior District Judge